

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

IN RE:	*	CHAPTER 13
	*	
SHANCEE YVONNE HARRISON,	*	CASE NO. 15-56994-JRS
	*	
DEBTOR.	*	

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IN RE:	)	
	)	
SHANCEE YVONNE HARRISON,	)	
	)	
MOVANT,	)	<b>CONTESTED MATTER</b>
	)	
v.	)	
	)	
UNITED CONSUMER	)	
FINANCIAL SERVICES,	)	
	)	
RESPONDENT.	)	

**OBJECTION TO CLAIM**

COMES NOW, the Debtor, Shancee Harrison, by and through her undersigned attorney, and hereby objects to the Proof of Claim filed by Respondent in this Chapter 13 Case. As grounds for this Objection, the Debtor shows this Honorable Court the following:

1.

This case was commenced by the filing of a Voluntary Petition for relief in the Bankruptcy under Chapter 13 of Title 11 of the United States Code on April 15, 2015.

2.

On June 9, 2015, Respondent filed secured Claim No. 6-1 in the amount of \$1,625.00. The Respondent attached a "Retail Installment Contract" for a Kirby vacuum cleaning system.

3.

The Debtor objects to Claim No. 6-1. Specifically, the Debtor advised that she never received the merchandise and she cancelled the agreement.

WHEREFORE, the Debtor prays:

- a) That Claim number 6-1 in the amount of \$1,625.00 be disallowed.
- b) That the Claim should be disallowed until hearing on objection; and
- c) For such other and further relief as this Court may deem necessary and proper;

Dated: July 8, 2015

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
Lureece D. Lewis, Esq.  
Attorney for Debtor/Movant  
GA Bar No. 520077  
The Cochran Firm  
547 Ponce de Leon Ave. Ste. 150  
Atlanta, GA 30303  
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**NOTICE OF HEARING**

**PLEASE TAKE NOTICE** that the Movant has filed an Objection to Respondent's Claim No. 6-1.

**PLEASE TAKE FURTHER NOTICE** that the Court will hold a hearing on the Motion in **Courtroom 1404, U.S. Courthouse, 75 Spring Street, SW, Atlanta, Georgia, 30303, at 2:00 p.m. on August 13, 2015.**

Your rights may be affected by the Court's ruling on these pleadings. You should read these pleadings carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have any attorney, you may wish to consult one.) If you do not want the Court to grant the relief sought in these pleadings or if you want the Court to consider your views, then you and/or your attorney must attend the hearing. You may also file a written response to the pleading with the Clerk at the address stated below, but you are not required to do so.

If you file a written response, you must attach a certificate stating when, how, and on whom (including addresses) you served the response. Mail or deliver your response so that it is received by the Clerk at least two business days before the hearing. The address of the Clerk's Office is: **Clerk, U.S. Bankruptcy Court, 1340 U.S. Courthouse, 75 Spring Street, SW, Atlanta, Georgia, 30303.** You must also mail a copy of your response to the undersigned at the address stated below.

Dated: July 8, 2015

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
Lureece D. Lewis, Esq.  
Attorney for Debtor/Movant  
GA Bar No. 520077  
The Cochran Firm  
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UNITED CONSUMER	)	
FINANCIAL SERVICES,	)	
	)	
RESPONDENT.	)	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the within pleading upon the following by depositing a copy of the same in the U.S. Mail with sufficient postage affixed thereon to ensure delivery. Any FDIC insured depository institutions have been served by Certified Mail in accordance with Fed. R. Bankr. P.7004(h).

Shancee Harrison  
5309 Mountain Village Court  
Stone Mountain, GA 30083

United Consumer Financial Services  
c/o Bass & Associates, P.C.  
Attn: Susan, Karder, Admin. Assistant  
3936 E. Ft. Lowell, Ste. 200  
Tucson, AZ 85712

United Consumer Financial Services  
c/o Corporate Creations Network, Inc.  
Registered Agent  
119 E. Court St.  
Cincinnati, OH 45202

United Consumer Financial Services  
Attn: James Barnhart, Director  
865 Bassett Rd.  
Westlake, OH 44145

I further certify that, by agreement of parties, Adam Goodman, Standing Chapter 13 Trustee, was served via the ECF electronic mail/noticing system.

Dated: July 8, 2015

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
Lureece D. Lewis, Esq.  
Attorney for Debtor/Movant  
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